

From: PRUDENCE PARKS at #278-9272

To: William F. Caton, Sec., FCC at #202-653-5482

05-20-94 04:43 pm
001 of 005

FCC MAIL SECTION

93-61

Rm 222

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To: William F. Caton, Sec., FCC

Date: 5-20-94

From: PRUDENCE PARKS

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From: PRUDENCE PARKS at #278-9272
To: William F. Caton, Sec., FCC at #202-653-5402

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05-20-94 04:44 pm
002 of 005

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PRUDENCE H. PARKS
ATTORNEY AND COUNSELOR AT LAW
11301 POPES HEAD ROAD
FAIRFAX, VIRGINIA 22030

703-278-9272
(PHONE AND FAX)

May 20, 1994

RECEIVED

MAY 23 1994

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

EX PARTE

William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

RE: PR Docket 93-61: Automatic Vehicle Monitoring Systems

Dear Mr. Caton:

On Thursday, May 19, 1994, representatives of the natural gas utility industry held several meetings at the FCC regarding the Automatic Vehicle Monitoring (AVM) issues being addressed in the proceeding indicated above. These meetings were held with Mr. Ralph Haller and Ms. Beverly Baker of the Private Radio Bureau and with Mr. Dick Smith and Dr. Michael Marcus of the Field Operations Bureau.

Those companies representing the natural gas utility industry included: Washington Gas (Ron Boone and Prudence Parks), Southern California Gas Company (Gordon Schlesinger and Robert Beauregard), Brooklyn Union Gas (Frank Earl), Boston Gas (Stuart Hemingway), Philadelphia Gas Works (Ken Myers and Paul Donahue), Consumers Power (Mary Jo Kripowicz), the American Gas Association (Jeff Clarke), and Lukas, McGowan, Nace & Gutierrez (George Lyon, Tom Adcock, Solyman Ashrafi and Liz Sachs).

All of these utilities have made sizeable investments in automatic meter reading systems (AMR's) which employ Part 15 devices operating in the 902-928 MHz band. These low-cost AMR's have increased efficiency, lowered operating costs, and greatly improved the quality of service for residential customers. Now consumers are able to receive actual, not estimated, monthly bills. There is also the problem of limited access to inside meters because people are not home or are very reticent to allow a meter reader inside the home for security reasons. The use of AMR's has solved this problem, too.

Washington Gas, the natural gas distribution company for the Washington

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Metropolitan area, has purchased 250,000 AMR's. It has installed 180,000 to date. The remaining 70,000 are being installed at a rate of 2000 per week. To

William F. Caton
May 20, 1994
Page Two

date, it has invested \$16 million in purchase and installation costs. The company plans to purchase and install an additional 150,000 AMR's, for a total investment of \$32 million.

Other utilities have made similar investments. Consumers Power stated that they plan to install 2 million AMR's over the next ten years, representing a \$90 million investment. The American Gas Association is compiling a list of companies and their present and projected investments in AMR technology which will be made available to the FCC early next week.

These utility companies are very concerned that they could be forced to cease operations due to interference with a licensed AVM system in the same 902-928 MHz band. The FCC has indicated during these and previous meetings held on May 5, 1994 that actual field test data on the interference problem would be very useful in crafting an accommodation of competing interests in the final rule. Therefore, the utilities have agreed to conduct such a test and will seek the cooperation of Teletrac. A design plan for that field test will be submitted to the FCC for its review next week.

Two copies of this notice are herewith submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules. The additional information cited above will also be submitted as part of the record on the above-referenced proceeding as soon as it is available.

Please stamp and return the provided copy to confirm your receipt. I can be contacted at (703)278-9272 should you have any questions or require additional information concerning this matter.

Sincerely,

Prudence H. Parks
Federal Government Relations
for Washington Gas

EX PARTE OR LATE FILED

05-20-94 04:46 pm
004 of 005

PRUDENCE H. PARKS
ATTORNEY AND COUNSELOR AT LAW
11301 POPES HEAD ROAD
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